

Ex. A

EXHIBIT A

Excerpts of transcript of the December
7, 2018 deposition of Dean Meyer,
Rule 30(b)(6) witness for Federal
Home Loan Mortgage Corporation

Ex. A



Planet Depos[®]
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Transcript of Dean Meyer, Corporate Designee

Date: December 7, 2018

Case: SFR Investments Pool 1, LLC -v- Washington Mutual Bank

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Transcript of Dean Meyer, Corporate Designee

1 (1 to 4)

Conducted on December 7, 2018

	1		3
1	DISTRICT COURT	1	A P P E A R A N C E S
2	CLARK COUNTY, NEVADA	2	ON BEHALF OF THE PLAINTIFF:
3	- - - - - x	3	JASON MARTINEZ, ESQUIRE
4	SFR INVESTMENTS POOL 1, LLC a :	4	KAREN HANKS, ESQUIRE
5	Nevada limited liability company, :Case No.:	5	Kim Gilbert Ebron
6	Plaintiff, :A-12-672769-C	6	7625 Dean Martin Drive
7	v. :	7	Suite 110
8	WASHINGTON MUTUAL BANK, a Federal :DEPT NO. 28	8	Las Vegas, Nevada 89139
9	Association, JP MORGAN CHASE BANK, NA, :	9	702.485.3300
10	MTC FINANCIAL, INC dba TRUSTEE CORPS, :	10	(Via videoconference.)
11	a California Corporation, and :	11	
12	GREGORY COOPER, an individual; :	12	ON BEHALF OF FREDDIE MAC:
13	DOES I through X, ROE CORPORATIONS :	13	JOHN H. MADDOCK, III, ESQUIRE
14	I through X, inclusive, :	14	McGuireWoods LLP
15	Defendants. :	15	Gateway Plaza
16	- - - - - x	16	800 East Canal Street
17		17	Richmond, Virginia 23219
18	Videoconference Deposition of FREDDIE MAC,	18	804.775.1000
19	By and through its Designated Representative,	19	
20	DEAN MEYER	20	TIFFANY JOSEPH GOODSON, ESQUIRE,
21	McLean, Virginia	21	Freddie Mac
22	Friday, December 7, 2018	22	
23	Job No.: 219469 2:03 p.m.	23	
24	Pages: 1 - 67	24	
25	Reported by: Lisa Kirk	25	
	2		4
1	Deposition of DEAN MEYER, held at	1	C O N T E N T S
2	the offices of:	2	EXAMINATION OF DEAN MEYER
3	PLANET DEPOS - TYSONS CORNER	3	PAGE
4	8270 Greensboro Drive	4	By Mr. Martinez 5, 63
5	Suite 110	5	By Mr. Maddock 59
6	McLean, Virginia 22102	6	
7	888.433.3767	7	
8		8	
9		9	
10		10	E X H I B I T S
11	Pursuant to Notice, before Lisa Kirk,	11	(Attached to the transcript.)
12	Court Reporter and Notary Public in and for the	12	MEYER DEPOSITION EXHIBIT PAGE
13	Commonwealth of Virginia.	13	Exhibit 1 Chase_Cooper_FHLMC0001 - 65
14		14	Chase_Cooper_FHLMC0007,
15		15	Chase_Cooper_FHLMC0059,
16		16	Chase_Cooper_FHLMC0060,
17		17	Chase_Cooper_FHLMC0069,
18		18	Chase_Cooper_FHLMC00115,
19		19	Chase_Cooper_FHLMC00116
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	

Transcript of Dean Meyer, Corporate Designee

2 (5 to 8)

Conducted on December 7, 2018

<p>1 P R O C E E D I N G S</p> <p>2 Whereupon,</p> <p>3 DEAN MEYER,</p> <p>4 being first duly sworn or affirmed to testify to the</p> <p>5 truth, the whole truth, and nothing but the truth,</p> <p>6 was examined and testified as follows:</p> <p>7 EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>8 BY MR. MARTINEZ:</p> <p>9 Q (Inaudible.)</p> <p>10 (The court reporter requested that Counsel</p> <p>11 repeat the question.)</p> <p>12 Q Good morning. My name is Jason Martinez.</p> <p>13 I represent SFR Investments Pool 1, LLC. In the</p> <p>14 room with me is Karen Hanks. She also represents</p> <p>15 SFR. Could you please state and spell your name for</p> <p>16 the record?</p> <p>17 A So Dean Meyer; D-E-A-N, M-E-Y-E-R.</p> <p>18 Q And what is your current occupation?</p> <p>19 A I work for Freddie Mac.</p> <p>20 Q And what's your title with Freddie Mac?</p> <p>21 A Director of loss mitigation.</p> <p>22 Q And just as a preliminary matter, there</p> <p>23 were a number of documents that we had sent over. I</p> <p>24 just want to make sure you have all those documents</p> <p>25 in front of you. There should be six sets, I think.</p>	<p>5</p> <p>1 but it says FHLMC1, and then that one runs through</p> <p>2 7. And I have --</p> <p>3 MR. MADDOCK: Let me stop you there. This</p> <p>4 is John Maddock. The copy -- we have a document that</p> <p>5 has Bates numbers 1 through 5. And then there are</p> <p>6 two pages -- the last two pages, it appears that the</p> <p>7 right-hand side is cut off, so it's impossible to</p> <p>8 tell if there are Bates numbers.</p> <p>9 MR. MARTINEZ: Does it -- the last two</p> <p>10 documents you're referring to with the Bates numbers,</p> <p>11 does it look like it's a spreadsheet of some sort?</p> <p>12 MR. MADDOCK: Yes.</p> <p>13 MR. MARTINEZ: Okay. And then just -- it</p> <p>14 looks like it has columns that run A through M on the</p> <p>15 one page and A through P on the second page? You</p> <p>16 might have some of that cut off, but at least we're</p> <p>17 on the same page.</p> <p>18 MR. MADDOCK: Yes, we have columns A through</p> <p>19 J on both pages.</p> <p>20 MR. MARTINEZ: Okay. And those documents,</p> <p>21 for purposes of the depo, so that we're clear -- the</p> <p>22 document that starts -- the first column, A, is --</p> <p>23 it's I-D, underscore, loan, underscore, S-Y, S-T,</p> <p>24 underscore, G-E-N-D. That one will be -- that one is</p> <p>25 Bates-stamped as FHLMC6. If you want to put that on</p>
<p>1 A So I have two copies of a set of documents.</p> <p>2 Q Perfect. And just so I make sure that I</p> <p>3 have the same thing in front of me with you,</p> <p>4 (inaudible). Documents printed. There will be</p> <p>5 something called a Bates stamp and in this</p> <p>6 circumstance it starts with Chase, underscore,</p> <p>7 Cooper, underscore, FHLMC, and it has a series of</p> <p>8 numbers after that. Do you have that in front of</p> <p>9 you?</p> <p>10 A So none of the documents I have have a</p> <p>11 Bates stamp on them. Or some of the documents,</p> <p>12 okay.</p> <p>13 MR. MADDOCK: This is John Maddock on behalf</p> <p>14 of Freddie Mac. The deed of trust and corporate</p> <p>15 assignment of deed of trust are not</p> <p>16 Bates-numbered.</p> <p>17 Q Okay, but the other four, I guess, sets of</p> <p>18 documents are Bates-stamped, correct?</p> <p>19 A That's correct.</p> <p>20 Q And can you tell me the Bates stamps, just</p> <p>21 so we're on the same page? It looks like to me</p> <p>22 there's a grouping that starts at that Bates stamp I</p> <p>23 just relayed (phonetic) to you, but I'm going to</p> <p>24 refer to that by the numbers themselves. I'm not</p> <p>25 going to repeat that whole Bates stamp every time,</p>	<p>6</p> <p>1 a document (inaudible) --</p> <p>2 (The court reporter requested clarification</p> <p>3 regarding the question.)</p> <p>4 Q If you want to make a note on the actual</p> <p>5 document, that's fine. I just need to make sure you</p> <p>6 see that, so that what we're referring to in the</p> <p>7 deposition is clear on the transcript.</p> <p>8 Then the second spreadsheet, the column</p> <p>9 heading is a heading of NBR_LOAN_MIDAS; is that</p> <p>10 correct?</p> <p>11 A Yes.</p> <p>12 Q Okay. It's got four rows. That one is</p> <p>13 Bates-stamped as 7. And then I have, essentially,</p> <p>14 three other groupings of documents I want to make</p> <p>15 sure you guys have. The next set in sequential</p> <p>16 order, it starts with Bates stamps 59 and 60.</p> <p>17 A Yes, I have that.</p> <p>18 Q Okay. And the one after that is a single</p> <p>19 page that's Bates-stamped 69?</p> <p>20 A Yes.</p> <p>21 Q And then the final remaining two pages,</p> <p>22 Bates-stamped 115 and 116?</p> <p>23 A Yes.</p> <p>24 Q Perfect. All right. So let's start</p> <p>25 with -- first I actually want to look at the one</p>

Transcript of Dean Meyer, Corporate Designee

3 (9 to 12)

Conducted on December 7, 2018

	9		11
1 that's Bates-stamped 59 and 60. There's a large 2 redaction on the page that's mostly blacked out. 3 (Inaudible.)		1 Q Okay. And in Freddie Mac's system, is 2 there any way to tell the date that that number no 3 longer identified Washington Mutual and started to 4 identify JPMorgan Chase?	
4 (The court reporter requested clarification 5 regarding the question.)		5 A Yes. So in one of our systems or in the 6 reports that we maintain would show the conversion 7 from Washington Mutual to Chase.	
6 Q Just look at that one for me.		8 Q And has that document -- is that document 9 sitting in front of you today?	
7 A I have it.		10 (The court reporter requested that Counsel 11 repeat the question.)	
8 Q Okay. And then up at the top it says, 9 Freddie Mac Funding Details Report, and it indicates 10 that there's a seller name there and refers to 11 Washington Mutual Bank, correct?		12 A No.	
12 A Yes.		13 Q No, okay. Can you tell me what that 14 document is called or what system that would be in?	
13 Q And that -- the next line down says seller 14 identifier. Can you tell me what that six digit 15 code means?		15 A It would more than likely be another field 16 within the MIDAS system.	
16 A It's just a code that identifies who the 17 seller was. It's a code that we assign to an 18 individual seller. So in this case, seller -- that 19 ID is associated with Washington Mutual Bank.		17 Q And what would that field be?	
20 Q Okay. And that seller identification 21 number is unique to Washington Mutual, correct?		18 A I don't know the name of it. They would 19 track it somewhere within that system. The data 20 from that would come from our corporate data 21 warehouse, which would maintain the history of that 22 identification number.	
22 A Yes.		23 Q Okay. So that's -- effectively, that is a 24 change log, I guess you can put it, for this 25 identification number? It would show anybody who	
26 Q So what I mean by that, just to clarify, is 27 that no other entity can carry the same seller 28 identification number in Freddie Mac's system,	10		12
29 correct?		1 has been assigned to that number throughout the 2 history of that number?	
30 A No, that's not correct.		3 MR. MADDOCK: Objection, form.	
31 Q Can you clarify, because maybe the question 32 was confusing.		4 A We would have record to reflect the timing 5 of any change of name for any specific ID.	
33 A So --		6 Q Okay. And that system that basically 7 tracks changes made in the MIDAS system, or whatever 8 field you're referring to, does that track any other 9 changes within the MIDAS system other than just 10 seller identification numbers?	
34 Q Washington carries the seller 35 identification number 145046, correct?		11 A So, again, so it would be a field in the 12 MIDAS system, which is -- the data comes from our 13 corporate data warehouse. So it would just populate 14 that information within MIDAS when the 15 identification number had a change made to it in the 16 name of it.	
36 A They did at the time this loan was sold to 37 Freddie Mac.		17 Q I understand what you're getting at. What 18 I'm asking is, is there a separate field or way that 19 I could look into the MIDAS system to tell when that 20 change occurred? Other than knowing that it pulls 21 from a different set of data -- I understand that -- 22 I'm asking is there a way for me to see, you know, 23 September, whatever, 2008, identification number 24 goes from Washington Mutual to JPMorgan Chase? Is 25 there a way for me to see that?	
38 Q Okay. Does somebody else maintain that 39 seller identification number now?			
40 A So in the case of Washington Mutual, when 41 Chase purchased the assets from the FDIC of WAMU, 42 Chase took over that identification number.			
43 Q Okay. So do you know what date that 44 transfer occurred where the identification number 45 listed on this document, which refers to 46 Washington Mutual, was then transferred to 47 JPMorgan Chase?			
48 A So I believe it was in 2008, when the FDIC 49 transferred the assets of Washington Mutual to 50 Chase.			
51 Q Do you remember the specific date for that?			
52 A I do not recall, but I know it's published 53 on FDIC's website.			

Transcript of Dean Meyer, Corporate Designee

4 (13 to 16)

Conducted on December 7, 2018

	13		15
1 A So we --		1 for that particular ID, but we would have records	
2 MR. MADDOCK: Objection, form.		2 that would reflect the timing of the change in the	
3 A So we would have records that would be able		3 name for that specific seller ID.	
4 to reflect the change and the name from		4 Q Okay. And what types of records would	
5 Washington Mutual to Chase.		5 those be?	
6 Q Okay. And that's a system you're referring		6 A I would not be able to speak to exactly	
7 to that you don't have a name for?		7 whether they would be in a report, whether they	
8 A I believe it's -- it -- one of the places		8 would be in a log, or whether they would be in	
9 it's referenced is MIDAS, but I would have to check.		9 another system that would house that -- reflect that	
10 But I believe that's one of the places that would		10 change, but we would have that.	
11 reflect that change.		11 Q Would you review that type -- those types	
12 Q Okay. And then, now, around the scope of		12 of documents or anything like that before today's	
13 that, that system that you're talking about that		13 deposition in order to testify as to how those	
14 reflects changes in the MIDAS system, does that		14 changes were made?	
15 system reflect changes in other areas other than the		15 A If I was -- felt that that was something	
16 seller identification number?		16 that was material, then I would review those	
17 A No. Again, it's not reflecting change.		17 documents, yes.	
18 It's just populated with data from our corporate		18 Q Well, I mean, you already testified that	
19 data warehouse that would identify the change in		19 the seller identification number changed from WAMU	
20 that ID. So if there were changes in other areas of		20 to JPMorgan Chase, so did you review something in	
21 MIDAS, that would be reflected in other screens		21 preparation for your deposition today that led you	
22 within MIDAS.		22 to that conclusion?	
23 Q So when you're referring to that, are you		23 MR. MADDOCK: Object, asked and answered.	
24 saying that if they make a change in corporate data		24 A So yes. So the Funding Details Report	
25 warehouse, as you put it, that will now reflect on		25 identifies Washington Mutual Bank as the --	
	14		16
1 the MIDAS system, correct?		1 references that ID. The MIDAS screens, which would	
2 A So, again, MIDAS would reflect what		2 show that same ID as a seller, now reflects Chase as	
3 information is related to that -- in this case, the		3 the entity associated with that ID. So I know that	
4 identification number for that ID. That data that		4 there was a change. And I know from my knowledge	
5 hosts that information is our corporate data		5 that at the time of when the servicing transferred	
6 warehouse. So from the corporate data warehouse it		6 from Washington Mutual to Chase through the sale of	
7 would just automatically populate that change within		7 WAMU's assets from the FDIC to Freddie Mac, that's	
8 MIDAS.		8 when that change would have occurred, but I did not	
9 Q Okay. That, I understand. I get that. So		9 look at any records within Freddie Mac to verify the	
10 then, essentially, what happens is that after that		10 exact date.	
11 identification number is reassigned to		11 Q I want you to take a second to look at the	
12 JPMorgan Chase, all of the places in MIDAS where		12 second page of the document we just referred to as	
13 that identification number comes up are going to		13 Bates-stamped 60.	
14 represent JPMorgan Chase, correct?		14 MR. MARTINEZ: For the record, for the most	
15 A That's correct.		15 part this document is almost entirely redacted except	
16 Q Okay. Now, what I'm getting at is, is		16 for what appears to be one line on Bates stamp 60.	
17 there an independent way for me to tell exactly on		17 Q Now, we just talked about the seller	
18 what date that change occurred, meaning that it		18 identifier we were referring to on the previous	
19 shows Washington Mutual on, you know, prior to X		19 page. Is that different than what is in that first	
20 date and then post that date, it shows that it's		20 column, which is identified as a seller loan	
21 been changed to JPMorgan Chase? Is there a way for		21 identifier?	
22 me to tell?		22 A Yes.	
23 A So I'm not 100 percent sure if that would		23 Q Okay. What is a seller loan identifier?	
24 be reflected in MIDAS because MIDAS would reflect		24 A So each seller would have a unique loan	
25 what is currently in the corporate data warehouse		25 number assigned to the loan when they sell it to us.	

Transcript of Dean Meyer, Corporate Designee

5 (17 to 20)

Conducted on December 7, 2018

	17		19
1 So that is the seller's identification for this		1 A Yes.	
2 individual loan when it was sold to Freddie Mac.		2 Q Okay. Now, this seller loan identifier,	
3 Q Okay. And does that number ever translate		3 which is in the first column on page 60, is that	
4 to anywhere else in the MIDAS system that I would be		4 number anywhere on Bates stamp 115?	
5 able to track it that way?		5 A So yes.	
6 A Yeah. So whenever there is a servicing		6 Q Can you tell me where it is on that	
7 transfer and the new servicer assigns it its own		7 document?	
8 unique identifier loan number for that loan, then		8 A So on the right-hand side, where it says	
9 MIDAS or our corporate data warehouse would update		9 SSR loan number, that would be the seller/servicer	
10 what that identification number is, and that would		10 loan number, and that would be the loan number that	
11 feed into MIDAS.		11 the current servicer is using, identifying this loan	
12 Q Okay. And I have a question. I want you		12 in their system.	
13 to put another document next to this one so we can		13 Q Okay. And that -- the last four of that is	
14 compare the two. It's the one that is Bates-stamped		14 9547, and that matches up with the first column on	
15 115 and 116. First off (inaudible).		15 Bates stamp 60?	
16 (The court reporter requested clarification		16 A Correct.	
17 regarding the question.)		17 Q Okay. So, now, let's go back. I was just	
18 Q Do you have 115 and 116 in front of you?		18 trying to match the numbers up. Can we go back to	
19 A Yes, I do.		19 Bates stamps 59 and 60; just because I didn't ask	
20 Q Okay. Can you tell me what 115 represents?		20 this question broadly in the first instance. What	
21 Well, there's two screenshots on this page, so can		21 does the Freddie Mac Funding Details Report	
22 you tell me what this screenshot is?		22 generally show?	
23 A So these are screenshots of our business		23 A So the funding detail report is created	
24 records from our MIDAS mainframe system.		24 when a seller, in this case Washington Mutual Bank,	
25 Q Okay. Are they from a particular part of		25 sells, in this case, a pool of loans to Freddie Mac	
	18		20
1 the MIDAS system?		1 at any particular day. It identifies who the seller	
2 A No. It's the -- the header on here is		2 was. And then the parts that are redacted on the	
3 called -- it's the loan basic inquiry, so that is		3 two pages, every single row is another unique loan	
4 a -- a screen that has loan-basic information on an		4 that we purchased at the same time from	
5 individual loan.		5 Washington Mutual.	
6 Q Okay. So this -- and it looks like -- and		6 Q Okay. And is there any way to tell by	
7 I'm just looking at the screenshot at the top		7 looking at Bates stamps 59 and 60 the exact date	
8 left-hand corner. It says page 1 of 2?		8 that Freddie Mac allegedly acquired this loan from	
9 A That's correct. So the top screen is		9 WAMU or Washington Mutual?	
10 page 1; the bottom screen is page 2.		10 A So the Funding Details Report is not	
11 Q Okay. And then, now, that seller loan		11 time-stamped.	
12 identifier that we were talking about that's on		12 Q Okay. Do you know when this	
13 Bates stamp 60, is that located anywhere on		13 Funding Details Report was generated from the MIDAS	
14 Bates stamp 115?		14 system in order to be produced in this litigation?	
15 A Yes. If you look in the left-hand column		15 A So the Funding Details Report is not	
16 by, like, the third row down, it says seller number.		16 generated from MIDAS. It is a report that is	
17 That would house the seller number for who sold us		17 generated when the loan is sold to us from the --	
18 that particular loan.		18 our selling system. So when the servicer transmits	
19 Q And in this circumstance it looks like that		19 the data for all the loans they are selling to us,	
20 number is 145046.		20 this report memorializes who the seller was, and a	
21 (The court reporter requested clarification		21 list of loans, and under what product they sold it	
22 regarding the question.)		22 to at that time. So it's created at the time we buy	
23 A So I believe that's correct.		23 it.	
24 Q Okay. And that matches the seller		24 Q So this -- I know you said this report is	
25 identifier number on Bates stamps 59, correct?		25 not created or pulled from MIDAS, correct?	
	17		19
1 So that is the seller's identification for this		1 A Yes.	
2 individual loan when it was sold to Freddie Mac.		2 Q Okay. Now, this seller loan identifier,	
3 Q Okay. And does that number ever translate		3 which is in the first column on page 60, is that	
4 to anywhere else in the MIDAS system that I would be		4 number anywhere on Bates stamp 115?	
5 able to track it that way?		5 A So yes.	
6 A Yeah. So whenever there is a servicing		6 Q Can you tell me where it is on that	
7 transfer and the new servicer assigns it its own		7 document?	
8 unique identifier loan number for that loan, then		8 A So on the right-hand side, where it says	
9 MIDAS or our corporate data warehouse would update		9 SSR loan number, that would be the seller/servicer	
10 what that identification number is, and that would		10 loan number, and that would be the loan number that	
11 feed into MIDAS.		11 the current servicer is using, identifying this loan	
12 Q Okay. And I have a question. I want you		12 in their system.	
13 to put another document next to this one so we can		13 Q Okay. And that -- the last four of that is	
14 compare the two. It's the one that is Bates-stamped		14 9547, and that matches up with the first column on	
15 115 and 116. First off (inaudible).		15 Bates stamp 60?	
16 (The court reporter requested clarification		16 A Correct.	
17 regarding the question.)		17 Q Okay. So, now, let's go back. I was just	
18 Q Do you have 115 and 116 in front of you?		18 trying to match the numbers up. Can we go back to	
19 A Yes, I do.		19 Bates stamps 59 and 60; just because I didn't ask	
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22 you tell me what this screenshot is?		22 generally show?	
23 A So these are screenshots of our business		23 A So the funding detail report is created	
24 records from our MIDAS mainframe system.		24 when a seller, in this case Washington Mutual Bank,	
25 Q Okay. Are they from a particular part of		25 sells, in this case, a pool of loans to Freddie Mac	
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1 the MIDAS system?		1 at any particular day. It identifies who the seller	
2 A No. It's the -- the header on here is		2 was. And then the parts that are redacted on the	
3 called -- it's the loan basic inquiry, so that is		3 two pages, every single row is another unique loan	
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5 individual loan.		5 Washington Mutual.	
6 Q Okay. So this -- and it looks like -- and		6 Q Okay. And is there any way to tell by	
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10 page 1; the bottom screen is page 2.		10 A So the Funding Details Report is not	
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12 identifier that we were talking about that's on		12 Q Okay. Do you know when this	
13 Bates stamp 60, is that located anywhere on		13 Funding Details Report was generated from the MIDAS	
14 Bates stamp 115?		14 system in order to be produced in this litigation?	
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16 by, like, the third row down, it says seller number.		16 generated from MIDAS. It is a report that is	
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22 regarding the question.)		22 to at that time. So it's created at the time we buy	
23 A So I believe that's correct.		23 it.	
24 Q Okay. And that matches the seller		24 Q So this -- I know you said this report is	
25 identifier number on Bates stamps 59, correct?		25 not created or pulled from MIDAS, correct?	

Transcript of Dean Meyer, Corporate Designee

6 (21 to 24)

Conducted on December 7, 2018

	21		23
1 A Correct.		1 note is delivered to a third party. It's called our	
2 Q And you said it was pulled from the		2 document custodian. That custodian reviews the	
3 seller's systems that you use; is that correct?		3 information on the original note, compares that to	
4 A So when the seller transmits data for the		4 the data that the seller is transmitting to	
5 loans they're going to purchase or sell to		5 Freddie Mac to state I'm selling you this loan with	
6 Freddie Mac, it goes from their system to our		6 these particular details. They compare that to the	
7 system. It's called The Selling System. And that		7 information in the original note, and if the	
8 data is housed in -- again, all the loan-level data		8 information is consistent, they certify that that	
9 is housed in our corporate data warehouse. This		9 note is consistent with the data, and that triggers	
10 Funding Details Report is generated from that		10 us to purchase the loan.	
11 information.		11 Q And in this circumstance, who was your	
12 Q Okay. And The Selling System you're		12 document custodian?	
13 referring to, does that have a name other than		13 A At the time the loan was originated,	
14 calling it The Selling System?		14 Washington Mutual was the document custodian.	
15 A It's called The Selling System.		15 Q So then if I understand that correctly,	
16 Q Okay. Is there any way to tell when		16 Washington Mutual was not only the seller, but the	
17 documents are generated from The Selling System and		17 one that also -- the document custodian hired by	
18 not from MIDAS?		18 Freddie Mac to verify the information they provided	
19 A So as I stated, this is not generated from		19 to Freddie Mac to certify that it was a true and	
20 The Selling System. So when the seller transmits		20 correct copy and compare it with the note?	
21 data on loans that they're selling to Freddie Mac,		21 MR. MADDOCK: Objection, form.	
22 that data is housed in our corporate data warehouse.		22 A Yes.	
23 That corporate data warehouse is where the data		23 Q So WAMU certifies its own statements, and	
24 and -- that generates this Funding Details Report		24 Freddie Mac acted upon that certification to	
25 comes from.		25 purchase this loan?	
	22		24
1 Q Okay. I'm just trying to get an idea. So		1 MR. MADDOCK: Objection, form.	
2 is this Funding Details Report manually created,		2 A So yes, the document custodian, which this	
3 like, by human entry, or is it just, you know --		3 case was a entity within Washington Mutual Bank, was	
4 it's not drawn from a system and just printed,		4 under contract to Freddie Mac to provide those	
5 correct?		5 services.	
6 A It's automatically created at the time we		6 Q So when I ask my question of whether or not	
7 purchase the loans from the data that the seller has		7 Freddie Mac independently verifies the information,	
8 remitted, transmitted to Freddie Mac, and housed in		8 that answer is actually (inaudible) --	
9 our corporate data warehouse.		9 (The court reporter requested clarification	
10 Q So the information is entered by the		10 regarding the question.)	
11 seller, and Freddie Mac generates this report?		11 Q -- incorrect, because Freddie Mac does not	
12 A So the information is created by the		12 independently verify this information? It has the	
13 seller, transmitted to Freddie Mac through		13 seller verify the seller's information before	
14 The Selling System. That data is housed in our		14 Freddie Mac purchases the loan?	
15 corporate data warehouse once we purchase the loans,		15 A So that's not correct. So we contract with	
16 and that data generates this report.		16 a third party. In this case, an entity within	
17 Q Okay. So somebody at Freddie Mac creates		17 Washington Mutual. It's a separate company from the	
18 this report?		18 seller -- to -- and we contract with them to do that	
19 A Correct.		19 verification for us. And they're under contract to	
20 Q Does Freddie Mac do anything to		20 do that.	
21 independently verify the information that's provided		21 Q And in simpler form (phonetic), Washington	
22 to you by a seller?		22 Mutual verified the information that Washington	
23 A Yes.		23 Mutual provided you, and then you acted upon that	
24 Q What do you do?		24 certification to purchase that loan without	
25 A So when we purchase a loan, the original		25 Freddie Mac doing anything on its own to verify that	

Transcript of Dean Meyer, Corporate Designee

7 (25 to 28)

Conducted on December 7, 2018

	25		27
1 information?		1 number here is 145046, which is what was previously	
2 MR. MADDOCK: Objection, form.		2 used to identify Washington Mutual, and now	
3 A So, again, we rely on the custodian that we		3 identifies JPMorgan Chase as of December 12, 2017?	
4 hire, whether it's Washington Mutual or another		4 A Yeah, at the time of this screenshot that	
5 party, to verify that information, and they're under		5 is what the information reflected, yes.	
6 contract to do that for us, and we rely on that		6 Q Okay. Is there a way to access -- well,	
7 information.		7 let me ask this question differently. Does this	
8 Q So Washington Mutual verified Washington		8 screenshot just identify who a servicer for	
9 Mutual's information, and you relied on it?		9 Freddie Mac is, but it's not tied to a particular	
10 MR. MADDOCK: Objection, form, and asked and		10 loan?	
11 answered.		11 A Correct. So this -- every loan in MIDAS	
12 MR. MARTINEZ: He hasn't really answered my		12 that has a seller number of 145046 -- this is how we	
13 question. It's a yes or no.		13 would reference to see who is the entity that is	
14 Q So did you hire Washington Mutual to verify		14 associated with that ID.	
15 the information Washington Mutual was providing you,		15 Q Okay. So this is, effectively, a catalog	
16 and then you relied on that information?		16 of -- these are the servicers for Freddie Mac and	
17 MR. MADDOCK: Objection, form.		17 here are their unique identifiers?	
18 A Yes.		18 A That sounds accurate, yes.	
19 Q Okay. Now, I want to look at -- sorry. I		19 Q Okay. And on the screenshot at the top on	
20 want to look at Bates stamp 116. If we can go to		20 116 it says status, colon, suspended. Can you tell	
21 that one. Now, these look to be two separate		21 me why that's there?	
22 screenshots. They don't look like page 1 of 2 and 2		22 A So if status is suspended, that shows that	
23 of 2. They both appear to be -- well, I guess we'll		23 the seller number, so the 145046, is suspended,	
24 go in order. That top screenshot, can you tell me		24 meaning we are not allowing that ID to be used to	
25 what that is?		25 sell loans to Freddie Mac at the time -- at least at	
	26		28
1 A So they are separate screens within MIDAS.		1 the time we were looking at this.	
2 The first screen -- the top screen says -- it's		2 Q Is there any way to tell when this --	
3 called S, slash, S, so seller, slash, servicer		3 again, here, I'll use this as a comparison. In the	
4 profile inquiry.		4 second screenshot on the bottom it looks to be	
5 Q Okay. And what does this screenshot tell		5 similar, but it says status: active.	
6 me?		6 A Right. So that is a separate screenshot of	
7 A So this identifies with a particular		7 a seller/servicer profile using the identification	
8 seller/servicer number. In this case, the 145046		8 number. I believe it's 877963. So that identifies	
9 identifies who that is currently in our system.		9 who the -- in this case, the seller or servicer that	
10 Q Okay. And is there a way to tell when this		10 is associated with that number. And in that case,	
11 screenshot was, I guess -- when the screenshot was		11 that number is -- status is active.	
12 taken?		12 Q Okay. Now, when comparing the statuses, is	
13 A So, yes, on the top right-hand corner it		13 there any way to tell -- well, here is another	
14 has a date of 12/12/2017, is the date this		14 question. Are there any other statuses that can be	
15 screenshot was generated.		15 reported on these screenshots other than active or	
16 Q Okay. And like we talked about before,		16 suspended?	
17 when the information is changed in the corporate		17 A I believe those are the two options.	
18 data warehouse, that information reflects in the		18 Q Okay. So then I would assume if it's not	
19 screenshots, obviously, after those changes were		19 suspended, it is active then, since those are the	
20 made, right?		20 only two options?	
21 A Yeah, so once the data in the corporate		21 A That's my understanding, yes.	
22 data warehouse is changed for any field on any loan,		22 Q Okay. So, now, on the first screenshot is	
23 if that field is a loan that's captured in MIDAS,		23 there any way to tell at what point that status was	
24 the new information would be reflected in MIDAS.		24 reflected -- well, changed from active to suspended?	
25 Q Okay. And that's why the seller/servicer		25 A Not on this particular screen, no.	

Transcript of Dean Meyer, Corporate Designee

8 (29 to 32)

Conducted on December 7, 2018

	29		31
1 Q	How would I find that out?	1 A	So JPMorgan Chase has multiple
2 A	Again, similar to when the timing of the	2	identification numbers that they use to be
3	name associated with that ID changed from	3	identified as a servicer of loans for Freddie Mac,
4	Washington Mutual to JPMorgan Chase, I would look	4	so there would be separate screens for other
5	for that same information in the same place that	5	identification numbers that JPMorgan Chase has. In
6	would identify when that identification number was	6	this case, there's ten more pages of those.
7	suspended. But it would not be housed in this	7 Q	So, essentially, if I understand your
8	screen on MIDAS.	8	testimony, JPMorgan Chase would have 11 different
9 Q	Is there a particular screen or a separate	9	six-digit identifiers for (inaudible) --
10	area or report within MIDAS or generated by	10	(The court reporter requested clarification
11	Freddie Mac that would tell me that information?	11	regarding the question.)
12 A	So there would be a way to identify when	12 Q	-- acting as a servicer on behalf of
13	that change occurred. I currently do not recall	13	Freddie Mac?
14	today where that would be, but I could get it.	14 MR. MADDOCK:	I'm going to object on whether
15 Q	Okay. And then what I'm going to do is	15	that accurately reflects his prior testimony.
16	leave a spot in the transcript for you to fill in	16	Go ahead.
17	later once you find that information. And then once	17 A	So there would be 11 more pages. I would
18	you get a chance to review, I'd like you to fill	18	not be able to know, standing here, whether that
19	that information in for me. Can you do that?	19	would have one identification number per page to
20	Because that's something that I would like to know.	20	know if there was exactly 11.
21 MR. MADDOCK:	We'll see about that, but go	21 Q	Okay, but -- I understand that, but you are
22	ahead and leave your blank in the transcript.	22	saying that JPMorgan Chase has got multiple
23 MR. MARTINEZ:	Very well.	23	six-digit identifiers in the MIDAS system, correct?
24 (The following lines were intentionally left blank.)		24 A	Yes.
25		25 Q	Why would it have multiple identifiers for
	30		32
1		1	JPMorgan Chase in the MIDAS system?
2		2 A	So it's at the seller or servicer's
3		3	discretion. They -- typically, they like to
4		4	identify pools of loans that they service or are
5 Q	So now I want to look at that second	5	under contract that they have sold us to track them
6	Screenshot on that same page, 116. So it looks to	6	separately, and those identifiers help them to be
7	me that when you compare the top screenshot with the	7	able to track them within our systems and the
8	bottom screenshot, they both identify a	8	reports that we provide them.
9	seller/servicer name, I guess is how we're using	9 Q	Okay. So you leave that up to the
10	that distinction, as JPMorgan Chase Bank, NA,	10	servicer? What, do they file separate applications
11	11 correct?	11	12 obtaining another six-digit identifier other than
12 A	Correct.	12	13 one they were originally given?
13 Q	Okay. And both of these screenshots were	14 A	So you're correct. They would submit a
14	taken on December 12, 2017, right?	15	request to be provided an additional identification
15 A	That's correct.	16	number that they would like to use to track either
16 Q	And there's no way to independently tell on	17	the selling or servicing of a particular set of
17	this screenshot when the seller/servicer number	18	loans.
18	changed or was modified for JPMorgan Chase, correct?	19 Q	Okay. And in this circumstance, these
19	This screenshot won't tell me that?	20	additional ten pages that would be behind the
20 A	So if that identification number was ever	21	22 screenshot or within the system would likely
21	changed, the particular name for it would not be	22	23 identify whatever other servicer numbers they
22	identifiable in this screenshot, correct.	23	decided to apply for?
23 Q	Okay. Now, the second screenshot says it's	24 A	Yes.
24	page 1 of 11. What are the other ten pages that	25 Q	Now, I want to go back up to the top
25	would follow this screenshot?		

Transcript of Dean Meyer, Corporate Designee

9 (33 to 36)

Conducted on December 7, 2018

	33		35
1 screenshot where it says suspended. Does that 2 status, suspended, mean that JPMorgan Chase is not 3 allowed to service loans under that servicing number 4 for Freddie Mac?		1 A I did not -- 2 MR. MADDOCK: Objection, mischaracterizes 3 his testimony.	
5 A Well, it reflects that they're not 6 allowed -- so, correct, so there are no loans that 7 JPMorgan Chase is allowed to sell or service for 8 Freddie Mac under that identification number.		4 A So I did not say it did. I said that could 5 be one of the reasons why identification numbers 6 could be suspended.	
9 Q Okay. Then, again, I go back to when was 10 this identification number that JPMorgan is now -- 11 was functioning under, when was it suspended?		7 Q Okay. Is there anywhere else in any of the 8 systems that Freddie Mac has where you can go and 9 find out the reason why this seller number was 10 suspended?	
12 MR. MADDOCK: Objection, asked and answered.		11 A At a minimum, I could find out the timing. 12 Whether there was any reason retained within those 13 systems, I would have to look.	
13 A So I believe I answered that. It would not 14 reflect in this screen. We would have records that 15 would reflect the timing of that. I just don't know 16 where that would be housed sitting here, but I could 17 get it.		14 Q Okay. I'm going to leave a spot in the 15 transcript for you to fill that in there, too, 16 because what I want to know is the reason why this 17 switched to suspended. If you can find that in your 18 system and identify the system that contains that, I 19 would appreciate it.	
18 Q Okay. Now, when it says that the status 19 here is suspended, does that stop -- and because you 20 mentioned that JPMorgan has multiple servicing 21 numbers that it functions under -- does that stop 22 JPMorgan from servicing for Freddie Mac in its 23 entirety as an entity or just under this servicing 24 number, 145046?		20 MR. MADDOCK: On the record, to make the 21 record clear, he's answered the question, but go 22 ahead.	
25 A Just under that specific ID.	34	23 MR. MARTINEZ: I don't think he's answered 24 the question. I think he just left it open that he 25 could find it.	36
1 Q Okay. What circumstances would force -- I 2 guess would end up getting the status of a 3 particular servicing number suspended?		1 Q So when you go and you find it, I want you 2 to go back into the transcript and review it and 3 fill in that information for me since you were not 4 able to know that today and testify as to that 5 detail today.	
4 A Well, in some cases it could be at the 5 seller's request to say we are no longer going to 6 use that identification number to sell you loans, so 7 please -- you know, they wouldn't call it suspended, 8 but please know we're not going to deliver loans to 9 you anymore; we don't wish to deliver loans or 10 service loans for you. That would cause us to put 11 it in that suspended category to ensure they don't. 12 It could be that they have requested to stop using 13 it. It's usually the seller or the servicer says I 14 want to stop using that ID. Or, in this case, it 15 could be that Washington Mutual, when they went 16 under receivership of the FDIC, that we suspended 17 the ability for anyone with that -- using that ID to 18 sell or service loans for us.		6 MR. MADDOCK: His testimony was that he 7 could find it, not that he was going to find it, but 8 go ahead.	
19 Q Okay. So you're saying that in this 20 circumstance, when WAMU was taken receivership by 21 the FDIC, and JPMorgan Chase acquired this loan from 22 the FDIC, and that relationship (phonetic), that 23 that would have been the time where this status 24 would have changed from active to suspended for this 25 servicing number?		9 MR. MARTINEZ: Are you saying that he's 10 going to testify to information and then not allow me 11 to go into discovery as to the information he's 12 relying on?	
		13 MR. MADDOCK: He's answered the question. 14 Go ahead.	
		15 MR. MARTINEZ: Okay. 16 (The following lines were intentionally left blank.)	
		17	
		18	
		19	
		20	
		21	
		22 Q Now, I want to move on to the document 23 that's Bates-stamped 69. At the top it says loan 24 status manager. Do you have that document in front 25 of you?	

Transcript of Dean Meyer, Corporate Designee

10 (37 to 40)

Conducted on December 7, 2018

	37		39
1 A Yes, I do.		1 actually suspended?	
2 Q Can you tell me what this document is?		2 A Correct. I can tell you, from looking at	
3 A So this is a report. So it's called a TOS		3 this TOS report, that up until 10/16/2014, at a	
4 summary report, so TOS stands for transfer of		4 minimum up to that point in time, that ID was	
5 servicing. It comes from our loan status manager		5 active.	
6 reporting system. So this is a report that		6 Q How do you know that?	
7 identifies for a particular loan; this case, the		7 A Because no one would be allowed to have	
8 loan ending in 2094, which I believe is the loan we		8 loans underneath that identification number if it	
9 are discussing today; shows any transfer of the		9 was in a suspended status. They would -- it	
10 servicing from one identification number to another.		10 would be -- no loans would be under that	
11 Q Okay, so this would be the scenario you		11 identification number if it was suspended.	
12 were referring to before, where that 145046 number		12 Q And there's never been a circumstance where	
13 that was suspended, that would be a transfer from		13 a servicer under a suspended servicing number was	
14 that number to the new number that JPMorgan Chase		14 doing something they weren't supposed to be doing,	
15 would be identified under?		15 ever?	
16 A Correct.		16 MR. MADDOCK: Objection, form.	
17 Q Okay. And where can I see that on this		17 A So, no, what I'm stating is loans cannot be	
18 document? Can you walk me through that?		18 serviced or sold to Freddie Mac under a particular	
19 A So it will show you, if you go from left to		19 identification number if it's in a suspended status.	
20 right, it has request date. So that's the date that		20 So if a number was suspended, the date it was	
21 JPMorgan Chase notified Freddie Mac that they would		21 suspended, there would not be allowed to be any	
22 like to move the servicing of this particular loan		22 loans serviced or sold to us under that	
23 from the ID number, 145046, to the new number,		23 identification number.	
24 877903. That's the date they requested it. And the		24 Q Well, I understand your policy. What I'm	
25 date effective is the date that the servicing moved		25 asking is what actually occurred. There's really --	
	38		40
1 from that original identification number to the new		1 there's no way for you to tell whether or not	
2 identification number. So that would be		2 JPMorgan Chase was servicing this loan under a	
3 October 16, 2014.		3 suspended servicing number at any point because	
4 Q Okay. And you had indicated previously		4 these documents don't tell you that information?	
5 that the 145046 number was suspended and that no		5 MR. MADDOCK: Objection, form.	
6 servicing would be able to be conducted under		6 A So as I stated before, the documents in	
7 that -- under loans that were tagged to that number,		7 front of us do not show exactly when that	
8 correct?		8 identification number was placed in suspended	
9 (The court reporter requested clarification		9 status, but I could get it.	
10 regarding the question.)		10 Q Okay. Okay, so this -- if I'm looking at	
11 A So what I said is as of the date that this		11 this loan status manager report correctly, it looks	
12 screen was generated, which I believe was		12 to me that under the servicer from column, that is	
13 December 12, 2017, reflected suspended. So as of		13 the servicer and servicing number that servicing is	
14 that date, I can tell you no servicer was allowed to		14 being transferred away from, correct?	
15 service loans under that identification number.		15 A Correct.	
16 Looking at the loan status manager, I will make a		16 Q Okay. And in that box it identifies	
17 statement that up until at least 10/16/2014, the		17 JPMorgan Chase Bank, NA, and then it says formerly	
18 servicer ID number 145046 was in an active status		18 known as WAMU. Is there any way -- well, if this --	
19 because JPMorgan Chase couldn't have been servicing		19 let me ask this question differently. Now, the fact	
20 under that identification number if it was		20 that JPMorgan Chase Bank, NA is being identified as	
21 suspended.		21 formerly known as WAMU, is that due to the transfer	
22 Q But you don't know -- again, you testified		22 or purchase of the assets from the FDIC, the WAMU	
23 to previously, you can't tell by looking at any of		23 assets from the FDIC?	
24 the documents we have in front of us today when the		24 A I can't make an assumption, but that sounds	
25 loan number -- the servicing number 145046 was		25 logical, but I don't know exact reason why the	

Transcript of Dean Meyer, Corporate Designee

11 (41 to 44)

Conducted on December 7, 2018

	41		43
1 naming convention is that way. I can tell you the 2 seller or servicer, in this case, JPMorgan Chase, 3 chose to identify that ID with that naming 4 convention.		1 A Well, it would reflect any change in the 2 identification number which the loan was serviced 3 under. So in this case, when Chase took over the 4 servicing of this loan, they continued to use the 5 same identification number, so there would be no 6 change reflected in this report because it's -- 7 continued to be serviced under this same 8 identification number until October 16th of 2014.	
5 Q Okay. Well, because I have a question 6 about is this -- does this just reflect the fact 7 that there was something changed in the system, 8 meaning that instead of 145046 identifying 9 JPMorgan Chase only, that, you know, somebody at 10 Freddie Mac one day, or at the request of the 11 servicer, requested that the identification under 12 145046 be changed to JPMorgan Chase Bank, NA, 13 formerly known as WAMU?		9 Q Is there any way to get this TOS summary 10 report at a different date and time? So if I were 11 to go back in time and say I wanted to know at the 12 date of the foreclosure sale, on July 27, 2012, what 13 this screenshot reflected?	
14 MR. MADDOCK: Objection, form.		14 MR. MADDOCK: Objection, form.	
15 A No. I'm stating that the entity, in this 16 case, JPMorgan Chase, used that naming convention 17 for that particular identification number. That's 18 all it shows.		15 A Well, this loan status manager report would 16 only -- right, it pulls data from our corporate data 17 warehouse, which houses the current information on 18 individual loans. So loan status manager would not 19 be able to go back in history and say what was the 20 status at a certain date. I would have to look at 21 other records to reflect when that change occurred.	
19 Q Okay. And is there any way -- or can you 20 tell me who the servicer for this loan was at the 21 time you acquired it?		22 Q And what other records would you look to?	
22 A So the time we acquired it was 23 Washington Mutual.		23 A I'm not sure, but I know that we track when 24 an ID number is changed from one entity to another. 25 This is not the only time this occurs. And it would	
24 Q Okay. So Washington Mutual was the 25 servicer for the loan. And when did you say	42		44
1 Freddie Mac acquired it?		1 also -- I would be able to determine, through some 2 report or a system -- again, I'm not sure which -- 3 of the timing of the loan being -- that ID being 4 suspended, but I don't have it in front of me.	
2 A Freddie Mac acquired the loan, I believe, 3 on July 13, 2000-- well, it would be on the -- 4 MIDAS screen would reflect that, but it's 5 September 13, 2006.		5 Q Would you be able to tell through other 6 documents, since this document can't go back in 7 time -- what documents would you use to tell me who 8 the servicer was on July 27, 2012?	
6 Q Okay. So WAMU was the servicer from 7 July 2006 forward. How do I know when 8 JPMorgan Chase took over as the servicer?		9 A Well, I would be able to tell you the time 10 frame of from when we purchased a loan until that 11 identification number had any change to it. So 12 let's say from Washington Mutual to Chase, I would 13 be able to identify when that occurred. And then I 14 could tell you if that identification number was 15 ever changed or when the loan was serviced under a 16 new identification number, which this report 17 reflects.	
9 A So these screens would not reflect the 10 timing of the change from Washington Mutual to 11 Chase because Washington Mutual took over the 12 existing number it was serviced under. So, 13 remember, MIDAS only reflects the current entity, so 14 I -- similar to knowing when the loan was suspended 15 or the exact time of that change, it would be 16 reflected in other records, but not these that we're 17 looking at.		18 Q So when you testified that WAMU was the 19 servicer at acquisition July 2006, what information 20 are you basing that off of in order to provide that 21 testimony?	
18 Q Well, you said -- I think you testified 19 previously that this loan status manager, the TOS 20 summary report, specifically deals with transfers in 21 servicing, correct?		22 A Well, I --	
22 A Correct.		23 Q (Inaudible.)	
23 Q And that would house all the information 24 related to all the transfers of servicing related to 25 a particular loan?		24 (The court reporter requested that Counsel 25 repeat the question.)	

Transcript of Dean Meyer, Corporate Designee

12 (45 to 48)

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<p style="text-align: right;">45</p> <p>1 Q When you testified previously that WAMU was 2 the servicer in 2006 when Freddie Mac acquired this 3 loan, what information did you look at or review in 4 order to testify to that?</p> <p>5 A Well, I know that Wells -- I mean that 6 Washington Mutual sold us the loan. If the loan was 7 being serviced by any other entity and it 8 subsequently transferred to Chase or another entity, 9 that would be reflected here. In this case, the 10 original seller, which we all know was 11 Washington Mutual -- we identified that with that ID 12 number of 145046 -- was Wells -- I mean 13 Washington Mutual's identification number at the 14 time they sold us the loan, and we know that Chase 15 took over the assets of Washington Mutual sometime 16 in 2008. That's when the change in servicing would 17 have occurred.</p> <p>18 Q So you're inferring that from the 19 information you just gave me, but there is nothing 20 in the MIDAS system that you reviewed before today, 21 or any other system, that gave you that conclusion?</p> <p>22 MR. MADDOCK: Objection, form.</p> <p>23 A So there would be nothing in MIDAS that I 24 reviewed that would reflect the timing of when 25 Washington Mutual -- Washington Mutual was the</p>	<p style="text-align: right;">47</p> <p>1 Q Okay. So at the top it says it's the loan 2 status manager. So I assume that's the system that 3 this report is generated from?</p> <p>4 A That's correct.</p> <p>5 Q Okay, and what is this five-page document?</p> <p>6 A Well, it's called a mortgage payment 7 history report. So this is a report that shows all 8 of the monthly reporting that the servicer did on 9 this loan since the time we purchased it up until 10 the date of this report, which was identified as 11 December 12, 2017.</p> <p>12 Q Okay. Now, I want to go back and look at a 13 couple of entries that are in the report. If you 14 could turn to the second page, there is a -- there's 15 two boxes on the right-hand side about 16 three-quarters of the way down. One of them says 17 third-party foreclosure sale, and then it has a date 18 next to that. Do you see that?</p> <p>19 A Yes.</p> <p>20 Q Can you tell me why that information is 21 entered into the report?</p> <p>22 A So the report reflects information that the 23 servicer reports to us on a monthly basis. So in 24 this case, on that date -- so if you look at the 25 date on -- if you go from left to right on this</p>
<p style="text-align: right;">46</p> <p>1 identifier for that ID number and when that was 2 changed to Chase would not be reflected in the 3 documents I looked at within MIDAS, but I know that 4 I have access to those documents.</p> <p>5 Q (Inaudible.)</p> <p>6 (The court reporter requested that Counsel 7 repeat the question.)</p> <p>8 Q And those are the documents that we're 9 leaving a blank in the transcript for if you need to 10 come back in after your review to include that 11 testimony (inaudible) --</p> <p>12 (The court reporter requested that Counsel 13 check the volume and location of his microphone.)</p> <p>14 (Off-the-record discussion.)</p> <p>15 MR. MARTINEZ: Can you read back what I last 16 said for me?</p> <p>17 (Pending question read.)</p> <p>18 MR. MARTINEZ: That's fine. I don't 19 actually remember what I said right after that, but 20 that's sufficient for me.</p> <p>21 MR. MADDOCK: Same comment, same objection 22 with regards to leaving the blank.</p> <p>23 Q Okay. So now I want to take a look at the 24 documents that are Bates-stamped 1 through 5.</p> <p>25 A Okay, I have them.</p>	<p style="text-align: right;">48</p> <p>1 second column, on December 12, 2012, the servicer 2 reported to us that a foreclosure sale occurred and 3 it was sold to a third party. That's what that data 4 reflects.</p> <p>5 Q Okay. And on that same line -- I'm going 6 to use the column identifiers -- there's a column 7 there that's right next to the redacted one, to the 8 left of it, and that column carries a title of 9 proceeds. Do you see that on the first page?</p> <p>10 A Yes.</p> <p>11 Q Okay. And then if we track that all the 12 way down to this loan we were just talking about, 13 which looks like the date reported was 14 December 6, 2012, it indicates that the proceeds 15 there were \$196,626.55. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q What does that entry reflect?</p> <p>18 A So that entry reflects the bid price that 19 the servicer reported to us that the property sold 20 for and the information that they reported to us.</p> <p>21 Q Okay. And so all the information that's 22 included in this mortgage payment history report, 23 who enters that information?</p> <p>24 A So it's -- the servicer reports it to us. 25 That data goes into, again, our corporate data</p>

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13 (49 to 52)

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1 warehouse where all the loan-level data is created, 2 and when we go into loan status manager to generate 3 this report, it pulls the data that the servicer had 4 reported to us, that's housed in our corporate data 5 warehouse.		1 going, I think, probably, more than an hour at this 2 point. If there's a natural spot to take a quick 3 break, that would be great, but...	
6 Q Okay, but the servicer is the entity that 7 inputs this information in the first place? That's 8 who it comes from?		4 MR. MARTINEZ: Yeah, that's fine. We can do 5 that now if you want. We'll just come back to this 6 when we're done. Want to take a quick ten-minute 7 break? Or if you need any more than that, just let 8 me know.	
9 A Yeah, they report that data to us, correct.		9 MR. MADDOCK: Okay. Ten minutes.	
10 Q Okay. And do you know how they report 11 their -- or input all that information?		10 MR. MARTINEZ: Perfect. Thank you.	
12 A So this particular data is reported 13 through -- it's called DWR. That's just an acronym. 14 So that's the way they transmit that data to 15 Freddie Mac on a -- this is where they can report 16 data to us daily.		11 (Off the record.)	
17 Q Okay. That's the mechanism how it gets 18 there, but -- so do you know what DWR stands for?		12 BY MR. MARTINEZ:	
19 A It's an acronym, but I don't recall what 20 the acronym stands for.		13 Q Okay, so before we went off the record and 14 took a break, we were looking at the document that's 15 Bates-stamped 3, so if you could turn to that page 16 for me in case you moved away from it.	
21 Q Okay. And is that the system that the 22 servicer is entering information into, which then 23 ultimately transfers to Freddie Mac?		17 A I'm there.	
24 A Well, they don't enter -- they -- from 25 their servicing system they would feed that data		18 Q Okay. And on the right-hand side again 19 there's another column with what looks to be like a 20 separate entry that says inactive (sic) loan, and 21 that looks to be on the date of reporting of 22 January 20, 2011. Do you see that?	
	50	23 A Yes.	
1 from their system directly to -- through DWR into 2 our corporate data warehouse, where that data would 3 be received.		24 Q Okay. What does that entry mean?	
4 Q Okay, so DWR is, essentially, the medium by 5 which the information in the servicer's system gets 6 transferred to Freddie Mac?		25 A So our servicers are required to remit to	
7 A Yeah. It's the portal that they would go 8 to to transmit that data.			52
9 Q Okay. When the servicer inputs their 10 information, and in this circumstance it's either 11 WAMU or JPMorgan Chase -- when they input their 12 information into their own system, do you know how 13 they do that?		1 F Freddie Mac the interest that's due on the loan 2 every month regardless of whether the borrower is 3 making payments or not. Once the loan becomes a 4 certain age of delinquency, at least 120 days 5 delinquent, the servicer has the ability to stop 6 passing through that interest. And if they choose 7 to do it, though, that is the timing of when they do 8 that. So that deactivate loan means they're 9 inactivating the requirement to pass through 10 interest for Freddie Mac going forwards. That's all 11 that is.	
14 A No.		12 Q Okay. So then in order to -- okay, so when 13 they put this entry in, this is something done by 14 the servicer, correct, this inactive loan?	
15 Q So you don't know whether or not they are 16 manually entering every month the principal, 17 interests, and all that stuff, or whether or not 18 some of that is automatically generated?		15 A So the servicers report a code to us, so a 16 code that says I wish to deactivate this loan, 17 meaning -- and that means that they want to stop 18 remitting interest to Freddie Mac on this particular 19 loan, and that reflects that information.	
19 MR. MADDOCK: Objection, foundation.		20 Q Okay. And then that would have occurred -- 21 and based on this document, that occurred on 22 January 20, 2011?	
20 A Correct, I don't know how the servicer 21 generates that data.		23 A Correct.	
22 Q Okay. So I want to take another look at 23 page 3 of this document -- or Bates stamp 3. Sorry.		24 Q And is there -- so in order to -- well, 25 here's this question: Is there anywhere else on	
24 MR. MADDOCK: And Mr. Martinez, we have 25 been -- I don't want to cut you off. We've been			

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14 (53 to 56)

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1 these documents -- since this document was printed 2 December 12, 2017, we can say that, I guess, this 3 information reports all the way up to -- the most 4 recent date reported on the first page is 5 November 17, 2017. So between January 20, 2011 and 6 November 17, 2017, is there anything on this 7 document which indicates that the loan was 8 reactivated by the servicer, where they would start 9 remitting interest payments to Freddie Mac again?		1 see subsequent -- I mean prior to that there is one, 2 two, three, four -- for five months that they 3 remitted interest and no principal. And then before 4 that, you can see principal and interest being 5 remitted to Freddie Mac all the way back to when the 6 loan was purchased by us.	
10 A So if--		7 Q So then if I understand that correctly, and 8 correct me if I'm wrong -- so the five months it 9 looks like that there was no principal remitted, 10 that would be because the borrower stopped paying, 11 correct?	
11 MR. MADDOCK: Objection, form.		12 A So doesn't necessarily state that. It just 13 states that the servicer remitted interest to us, 14 because -- so that our loans are -- well, they're 15 scheduled out, meaning they have to send us the 16 scheduled interest that's due us and any actual 17 principal they receive from the homeowner. So in 18 this case, for those five months they did not 19 receive any principal from the homeowner, because 20 they're required to report it to us and remit it.	
12 A So if they had, you would see the row and 13 the timing of that, and it would actually say 14 reinstatement. And that would trigger -- that would 15 identify -- reflect when they requested that they 16 want to start remitting principal or interest to 17 Freddie Mac going forward. And that would be 18 reflected similar to where it says inactivate loan. 19 There would be a line that says reinstatement, and 20 then you would see them passing through principal 21 and at least interest going forwards.		21 But they did remit interest to us. Whether that 22 came from the borrower or not, Freddie Mac does not 23 know.	
22 Q Okay, so then --		24 Q Okay. And what requires the servicer to 25 remit the interest to Freddie Mac?	
23 A In this case there is none.			
24 Q Right, so they never -- so the servicer, in 25 this circumstance, never reactivated this loan?			
	54		56
1 A Correct.		1 A So that's the terms under which they 2 service loans for Freddie Mac. And our guide, which 3 is our contract, specifically requires them to -- 4 and, again, all our loans or most of our loans are 5 on a scheduled actual remittance, which means you 6 have to remit these scheduled interests due us every 7 month up until a time the loan pays off or you 8 inactivate the loan, and it gives -- sets forth the 9 terms under which they can inactivate the loan. So 10 they have to follow that.	
2 Q Or at least all the way up until 3 November 17, 2017. We don't know what it is today, 4 but...		11 Q So you had mentioned the guide. Is there a 12 separate document that governs the relationship 13 between Freddie Mac and its servicer?	
5 A So, yeah, that's the accounting cycle, 6 so -- and, again, this is monthly report, so 7 this -- report to us monthly, but as of that 8 accounting cycle in November of 2017 they had not 9 reinstated the loan in our system to start passing 10 through payments or interest.		14 A Well, the guide, as far as seller/servicer 15 guide, is the contract under which sellers and 16 servicers can either sell and service loans for us. 17 They have to comply with those requirements in that 18 document. That's our contract.	
11 Q Okay. And where -- which column on this 12 document does it show you that the servicer is 13 remitting payments of the interest to Freddie Mac?		19 Q Does the servicer and Freddie Mac, or even 20 the seller in that circumstance, ever sign the 21 guide? I've never seen there be a signature block 22 for the guide.	
14 A So where you see one, two, three, four, 15 five, six, seven, and eight -- the seventh and 16 eighth column it says principal due and interest 17 due?		23 A No. So when they become an eligible seller 24 or an eligible servicer, or both, we get a signature 25 from them on a form that says they will comply with	
18 Q Yeah.			
19 A If you go through -- down on those on each 20 individual page, right up to the row that says 21 inactivate, that --			
22 Q Yup.			
23 A -- you'll see that in that particular 24 accounting cycle they remitted \$963.45. That's the 25 interest that was due Freddie Mac. And then you can			

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15 (57 to 60)

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1	the terms of our guide.	1	or someone actually types in a code that gets
2	Q And what is that form called that you have	2	reported to us, I do not know.
3	them sign?	3	Q Okay.
4	A I don't recall the name of it, but it is --	4	MR. MARTINEZ: Now, I don't think I have
5	it's either a letter from the head of our sales	5	any more questions, but I just want to -- I mean, I
6	division or it's a form -- one of those two -- but	6	don't know if, John, you're going to have any
7	they would countersign that, saying yes, we agree to	7	questions.
8	comply with those requirements.	8	MR. MADDOCK: When you wrap up, I might just
9	Q So then that letter or form you're	9	take two minutes to consider it.
10	referring to, they actually sign, that would be the	10	MR. MARTINEZ: Okay. Yeah, go ahead and do
11	agreement between the parties, and then that would	11	that then. And, obviously, if I have any others,
12	just, what, incorporate the requirements in the	12	I'll follow up with that. And then I wanted to get
13	guide?	13	something on the record before we finish up, after
14	MR. MADDOCK: Objection, asks for a legal	14	the deposition is concluded.
15	conclusion.	15	MR. MADDOCK: Okay.
16	A So those would -- that would be a, again,	16	(Off the record.)
17	letter or form that says, yes, we -- from	17	EXAMINATION BY COUNSEL FOR FREDDIE MAC
18	Freddie Mac saying you are now an approved seller or	18	BY MR. MADDOCK:
19	servicer; by countersigning this, you agree to	19	Q Mr. Meyer, you testified that Chase
20	comply with the contract, which is our guide.	20	purchased certain assets from the FDIC in 2008. Do
21	Q Okay. Has a copy of that letter or form,	21	you recall testifying to that?
22	whatever was countersigned by the servicer, been	22	A Yes.
23	produced in this litigation?	23	Q And what were the assets that Chase
24	A No.	24	purchased in 2008?
25	Q Have you ever seen that document?	25	MR. MARTINEZ: Object to the form.
	58		60
1	A I have not seen the document for this	1	A So I don't know all the assets they
2	particular seller or servicer, but I've seen them	2	purchased. I know that this loan and other loans
3	before.	3	that Washington Mutual was servicing for us, they
4	Q But like I said, you haven't seen the one	4	purchased the servicing rights of those assets.
5	that would govern the relationship in this -- with	5	What other assets, I don't know.
6	this particular servicer, on this particular loan?	6	Q Okay. And with regard to the loan that
7	A That's correct.	7	we've been discussing today, what rights in the loan
8	Q Okay. Now, going back to this document	8	did Chase purchase from FDIC?
9	real quick, these entries that we referenced where	9	MR. MARTINEZ: Object to the form.
10	it says third-party foreclosure sale and deactivate	10	A They purchased the servicing rights.
11	loan, those are, like, manual entries that were put	11	Q Okay.
12	in by the servicer, correct?	12	MR. MADDOCK: All right, that's -- no other
13	MR. MADDOCK: Objection, form.	13	questions.
14	A No. So that is data that the servicer	14	MR. MARTINEZ: All righty, I don't have
15	reported to us. They're codes. And they usually	15	any more questions.
16	come from their system to our system. How they're	16	I just wanted to make sure, you know, John,
17	entered into their system, I do not know.	17	since you had an objection to what I was referring to
18	Q Okay. But these things aren't -- they	18	earlier about leaving a blank in the transcript for
19	don't automatically -- the system that the servicer	19	him to go back and review the documents he said he
20	works on doesn't automatically trigger these things?	20	could go back and review -- I just wanted to make it
21	That's something the servicer has to go in and	21	clear at the end, so that, you know, if there's going
22	report to Freddie Mac, right?	22	to be motion practice, we have a solidified spot in
23	A Well, the servicer would have to report to	23	the transcript to refer to, so I don't have to go
24	us those specific codes. How they generate those	24	searching around for it. Essentially, I understand
25	codes, whether it's automated based on other events,	25	you disagree, but my position is that -- and,

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16 (61 to 64)

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<p>1 specifically, the two facts I was looking for, that I 2 left blanks open for, were for why the suspension of 3 the servicer number 145046 occurred, and then when 4 that suspension occurred. And that was because of 5 the fact that based on the documents that Chase 6 produced in this litigation, Mr. Meyer could not 7 testify to that information, but he had indicated 8 that there were other documents he could go to to 9 find that information. That's the information I 10 want. And because that's put at issue in this case, 11 I think that that's a relevant fact that I should -- 12 I'm entitled to know, because it surrounds the 13 servicing rights and impacts the potential servicing 14 relationship with Freddie Mac and whomever its 15 servicer was at any given time.</p> <p>16 MR. MADDOCK: Well, the transcript will say 17 what it says. If you believe you have rights that 18 you can pursue, you're certainly free to do that, and 19 we would reserve all of our rights in response.</p> <p>20 MR. MARTINEZ: Okay. And I will do the 21 same. Obviously, that doesn't -- you know, if 22 Mr. Meyer is to go research and fill in the blank in 23 his transcript, as I'm requesting, obviously I'm 24 reserving my rights to respond to that information, 25 if that even has to come back and ask him another --</p>	<p>61</p> <p>1 ones that you said were cut off to column J. I just 2 want to ask him a couple questions because I had 3 never seen them before. But what I'll do is I'll 4 just continue to attach all the documents. So 1 5 through 7 will be attached. And then the other 6 Bates stamp is FHLMC59 and 60, FHLMC69, and FHLMC115 7 and 116.</p> <p>8 FURTHER EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>9 BY MR. MARTINEZ:</p> <p>10 Q And then, Mr. Meyer, if I could have you 11 turn to what's Bates-stamped 6 and 7 for me real 12 quickly. I understand that part of it is cut off.</p> <p>13 MR. MADDOCK: And Mr. Martinez --</p> <p>14 Q Do you have those documents in front of 15 you?</p> <p>16 MR. MADDOCK: Mr. Martinez, before you ask 17 questions, I would note that securitization is not a 18 listed topic, so instead of objecting to every one of 19 your questions as being outside the scope, I'll 20 object now.</p> <p>21 MR. MARTINEZ: Oh, if that's what these 22 documents pertain to -- I could not tell that by 23 looking at this. So if you don't mind, if I could 24 just ask him some foundational questions of what the 25 documents are to confirm that, and then I won't delve</p>
<p>62</p> <p>1 you know, a short depo just to respond to the 2 inputted information as he fills in the blank. I'm 3 reserving my right to do that.</p> <p>4 MR. MADDOCK: Okay.</p> <p>5 MR. MARTINEZ: Just so you understand.</p> <p>6 MR. MADDOCK: And we reserve our rights in 7 response.</p> <p>8 MR. MARTINEZ: No problem. I just wanted to 9 make it clear in the last bit of the record so we 10 could just get that on there. But that's all I have, 11 so unless there's anything else you have, John, then 12 we're good for the day.</p> <p>13 MR. MADDOCK: The only thing I would have is 14 that he would like to read and sign, so...</p> <p>15 MR. MARTINEZ: All right.</p> <p>16 (Off-the-record discussion.)</p> <p>17 MR. MARTINEZ: So just going back on the 18 record real quick, I just wanted to attach as 19 Exhibit 1, I guess, to the deposition the four sets 20 of documents that we had gone through this time. And 21 I'll go through the Bates stamps quickly. First off, 22 the Bates stamp is Chase, underscore, Cooper, 23 underscore, FHLMC00001 through 5. Sorry, guys. I 24 just realized that I did not ask him about pages 6 25 and 7, the ones that followed those first five, the</p>	<p>63</p> <p>1 into a topic that's outside the scope.</p> <p>2 MR. MADDOCK: All right, well, the objection 3 stands. Go ahead.</p> <p>4 MR. MARTINEZ: Sure.</p> <p>5 Q Mr. Meyer, can you tell me what this 6 document on Bates stamp 6 is?</p> <p>7 A So the two documents, page 6 and page 7, is 8 a screenshot of our business records that reflects 9 when a loan was placed into a security, and then 10 when it was removed from a security. That's what 11 those two pages reflect.</p> <p>12 Q Okay. And this document doesn't have a 13 title on it or a date or anything. Who prepares 14 these documents?</p> <p>15 A So they come from our business records. 16 This is generated at the time of when the loan is 17 removed from a security, that this is what our 18 system generates to reflect that activity. And then 19 this is housed in -- the data from this is housed in 20 our corporate data warehouse.</p> <p>21 Q Okay. Then based on this document, when 22 can you tell that this loan was removed from the 23 security or removed from securitization?</p> <p>24 A So if you look at page 7, in column F, the 25 header is DT mortgage removed, so that's date</p>

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<p>1 mortgage removed. And row 3, it has a date of 2 12/15/2010, so that's the date the loan was removed 3 from the security.</p> <p>4 MR. MARTINEZ: Okay. That's all the 5 questions I had. So that's all I have, so, yeah, I'm 6 done.</p> <p>7 (Off the record at 3:50 p.m.)</p> <p>8 (Meyer Exhibit 1 was marked for 9 identification and is attached to the transcript.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>65</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY REPUBLIC</p> <p>2</p> <p>3 I, LISA KIRK, the officer before whom the</p> <p>4 foregoing deposition was taken, do hereby certify</p> <p>5 that the foregoing transcript is a true and correct</p> <p>6 record of the testimony given; that said testimony</p> <p>7 was taken by me stenographically and thereafter</p> <p>8 reduced to typewriting under my direction; that</p> <p>9 reading and signing was requested; and that I am</p> <p>10 neither counsel for, related to, nor employed by any</p> <p>11 of the parties to this case and have no interest,</p> <p>12 financial or otherwise, in its outcome.</p> <p>13 IN WITNESS WHEREOF, I have hereunto set my</p> <p>14 hand and affixed my notarial seal this 4th day of</p> <p>15 January, 2018.</p> <p>16 My commission expires:</p> <p>17 July 31, 2022</p> <p>18</p> <p>19</p> <p>20</p> <p>21 </p> <p>22 _____</p> <p>23 NOTARY PUBLIC IN AND FOR</p> <p>24 THE COMMONWEALTH OF VIRGINIA</p> <p>25 Notary Registration Number - 7057881</p>
<p>1 ACKNOWLEDGEMENT OF DEONENT</p> <p>2</p> <p>3</p> <p>4 I, DEAN MEYER, do hereby acknowledge that I</p> <p>5 have read and examined the foregoing testimony, and</p> <p>6 the same is a true, correct, and complete</p> <p>7 transcription of the testimony given by me and any</p> <p>8 corrections appear on the attached Errata sheet</p> <p>9 signed by me.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18 (DATE) _____ (SIGNATURE)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>66</p>